

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

In Re: Asbestos Products Liability Litigation (No. VI); MDL 875

Regarding:  
THE UNITED STATES DISTRICT COURT  
MIDDLE DISTRICT OF ALABAMA

ROBERT D. BELUE, et al.,

Plaintiffs,

v.

A.O. SMITH ELECTRICAL PRODUCTS,  
COMPANY, etc., et al.,

Defendants.

\*  
\*  
\*  
\*  
\*  
\*  
\*  
\*  
\*

CIVIL ACTION NO.:  
2:06CV1034-WKW-WC

**DEFENDANT KAISER GYPSUM COMPANY, INC.'S  
JOINDER IN MOVING DEFENDANT'S MOTION FOR PARTIAL SUMMARY JUDGMENT**

Defendant, Kaiser Gypsum Company, Inc., by and through its attorney of record, hereby joins in and adopts by reference as if set forth fully herein, the Motion for Partial Summary Judgment and exhibits in support thereof (Doc. 254) filed on behalf of moving Defendant, Sunbeam Products, Inc. In filing this Motion for Partial Summary Judgment, Kaiser Gypsum Company, Inc. does not in any way waive any of the grounds set forth in its previously filed Motion to Dismiss, nor does it waive any additional grounds for Summary Judgment as to any Plaintiffs against whom Summary Judgment is sought in this Motion, nor does it waive any grounds against any Plaintiffs against whom Summary Judgment is not specifically sought in this Motion.

Respectfully submitted,

/s/ Vincent A. Noletto, Jr.  
VINCENT A. NOLETTO, JR. (NOLEV3868)  
Attorney for Defendant Kaiser Gypsum  
Company, Inc.

OF COUNSEL:

CARR ALLISON

6251 Monroe Street, Suite 200

Daphne, Alabama 36526

(251) 626-9340

(251) 626-8928 - fax

[vnoletto@carrallison.com](mailto:vnoletto@carrallison.com)

**CERTIFICATE OF SERVICE**

I hereby certify that I have on this 25<sup>th</sup> day of April, 2008, served a copy of the above and foregoing by electronic means via the CM/ECF to those registered with the CM/ECF.

/s/ Vincent A. Noletto, Jr.

OF COUNSEL